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MEMORANDUM

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TO Project File
Petro-Chem SC
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Date June 13, 2000

RE Update of Environmental Indicator Event Code CA 725

PURPOSE OF MEMO

This memo is written to formalize Petro-Chem SC's status in relation to the following RCRIS corrective action event codes

- 1) Human Exposures Controlled Determination (CA725)

HUMAN EXPOSURES CONTROLLED DETERMINATION (CA725)

There are currently four (4) national status codes in use by EPA Region IV. These are

- | | |
|-------|-------------------------------------|
| 1) YE | Yes, applicable as of this date |
| 2) NC | No control measures necessary |
| 3) NO | Facility does not meet definition |
| 4) IN | Incomplete, more information needed |

The four national status codes for CA725 are based on the entire facility. Therefore, every area at the facility must meet the definition before a code can be entered.

MEDIA BY MEDIA DISCUSSION OF CONTAMINATION AND THE STATUS OF PLAUSIBLE HUMAN EXPOSURES

Groundwater – Releases from SWMU's and/or AOC's have resulted in groundwater contamination across the site. The groundwater contains concentrations of chlorinated

solvents, metals and free product fuel oil. Currently, two extraction wells and an interceptor trench sump are used to control migration of the contaminated groundwater.

Soil – Soil at the facility is contaminated with volatile organics, metals and fuel oil. All contaminated soils are on site and access to the facility is limited by fencing and gates.

Air – Contamination from air emission is considered to be negligible. No contaminated soil or free product is exposed to the air at this time due to the installation of the interceptor trench.

Surface Water – Recent surface water samples from Wildcat Creek taken during the Phase 1 RFI have shown only intermittent and low level contamination. The potential for human exposure is considered to be minimal at this time.

STATUS CODE RECOMMENDATION FOR CA725

This facility has implemented interim measures with regard to contaminated groundwater migration through installation and operation of groundwater extraction wells. The facility has restricted access due to locked gates and fencing. Air emissions are no longer a consideration due to measures taken to remove free fuel product from seeping to the soil surface and removal of aboveground storage tanks and piping. Contamination of surface water due to runoff from impacted soils is currently considered to be minimal at this time. Therefore, it is recommended that CA725 YE be entered in to RCRIS.